U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Little City Building - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject:	**POLREP #4** **Final** **Little City Building** **Ottawa, IL** **Latitude: 41.3468652 Longitude: -88.8420776**
To:	Bradley Benning, ERB Valencia Darby, U.S. DOI Lindy Nelson, U.S. DOI Carolyn Bohlen, U.S. EPA Sam Borries, U.S. EPA Yolanda Bouchee-Cureton, U.S. EPA Jaime Brown, U.S. EPA Mindy Clements, U.S. EPA Mark Durno, U.S. EPA Jason El-Zein, U.S. EPA HQ EOC, U.S. EPA John Glover, U.S. EPA Matt Mankowski, U.S. EPA John Maritote, U.S. EPA Mike Ribordy, U.S. EPA Carol Ropski, U.S. EPA Brian Schlieger, U.S. EPA USCG PolRep Distribution, USCG Mark Johnson, ATSDR Bruce Everetts, Illinois EPA Reginald Pallesen, ORC Deena Sheppard, Enf. SP David Noble, City Engineer Charles Rodriguez, EPA
From:	Bradley Benning, OSC
Date:	9/9/2015
Reporting Period:	08/21/2015 to 09/09/2015

1. Introduction

1.1 Background

Site Number:	C55U	**Contract Number:**	EP-S5-08-02
D.O. Number:	0156	**Action Memo Date:**	5/19/2015
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	7/27/2015	**Start Date:**	7/27/2015
Demob Date:	9/9/2015	**Completion Date:**	9/9/2015

CERCLIS ID:	ILN000505583	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Little City Building Site's (LCB) owner of over ten years, attempted to clean up the building for possible redevelopment and/or sale. The contractor hired by the owner in fact gutted the building for scrap causing flooding, severe structural problems and the release of ACM throughout the building. Future attempts to sell the site were unsuccessful due to the ACM release and structural concerns. The owner offered to donate the building to the City of Ottawa, as they no longer had financial resources to address the deteriorating conditions in the building. The City of Ottawa hired consultants to conduct asbestos and structural surveys of the building in 2014, which confirmed ACM release and imminent structural concerns. The City of Ottawa requested assistance from EPA due to the escalating costs for ACM cleanup, structural repairs and /or demolition of the site. EPA conducted an assessment of the building and found additional structural damage, giving concern that partial or complete structural failure of the building is imminent. The Site was referred to the Region 5 Superfund Program through the Brownfield's Program.

The Site comprises approximately 34,200 square feet, is a five story multi-wythe brick wall and timber floor framed structure constructed in 1902. The building's exterior west wall shows significant signs of failure due to years of water damage. Several windows are now open as past board-up measures have failed. A large area of the roof has collapsed resulting in the pancaking of floor sections on all five stories of the building. Extreme damage to all interior rooms is apparent from many years of neglect and water damage. The City has placed barriers along the south and west perimeters to keep pedestrians clear of the building.

1.1.2.1 Location

The Site is located at 112 West Madison Street, Ottawa, LaSalle County, Illinois. The building abuts existing structures to the east with a small alley to the west. A parking lot is situated to the north and the south face is the original main entrance along Madison Street sidewalk. The building is in the downtown business district. The Site's geographical coordinates are 41.3468 North latitude and -88.8420 West longitude.

1.1.2.2 Description of Threat

The Site presents a threatened and an ongoing release of hazardous substances. Past actions to secure the building show evidence of failing, several windows are now open as board-up measures have failed and the roof is partially exposed, posing potential release of ACM to the environment. This building is severely damaged and contains friable ACM throughout the inside which would pose an imminent and substantial threat to public health should the building suffer a catastrophic failure.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The removal site evaluation utilized data from the Comprehensive NESHAP Asbestos Survey conducted January of 2014, by Midwest Environmental Consulting Services and Building Structural Survey conducted August 2014, by Fehr-Graham Engineering for the City of Ottawa, which documented the following site conditions.

A total of 25 homogeneous areas were sampled, with 12 areas testing positive for asbestos (Chrysotile 1-20%), and one area (boiler insulation) not sampled due to site conditions but assumed to be asbestos. The ACM included air cell pipe insulation, floor tile, mastic, caulking, window glazing and boiler insulation, all mixed with building debris observed throughout all five floors and basement of the building. An estimated 200 linear feet of pipe insulation and 280 square feet of boiler insulation were identified. All asbestos was considered friable.

The bulk sampling strategy was based upon the protocol of homogenous areas established by the USEPA. A homogeneous sampling area (HSA) is defined as an area of material that is uniform in color, texture, construction, general appearance, and date of installation. Bulk samples of suspect ACM were analyzed by Polarized Light Microscopy (PLM) utilizing the EPA-600/M4-82-020 Method. Bulk samples were analyzed using Asbestos Hazard Emergency Response Act (AHERA) "positive stop" protocol, meaning each sample of each HAS group is analyzed until asbestos is found in the HAS or all samples in the group are analyzed and are negative for asbestos content. Fehr-Graham Engineering performed an investigation of the building to ascertain the existing conditions and to make recommendations for necessary shoring and stabilization to allow the asbestos to be mitigated.

The collapsed floors along the west elevations have rendered the wall unsupported for its entire height. Masonry walls rely upon the lateral bracing provided by the floor systems. The bowing of the west wall observed from the exterior is consistent with unsupported masonry walls of this height.

The sagging floors immediately south of the collapsed bay require shoring along with areas of the fourth and fifth floors. Repairs to all levels require access between floors, which is currently limited due to the poor condition of the stairs. Further, any vibrations that are caused by stabilization work could be detrimental to the exterior masonry walls.

Fehr-Graham's professional opinion concludes that without stabilization and re-roofing the building may suffer from a partial or full collapse.

USEPA also conducted an assessment of the building on January 28th, 2015, to provide a second opinion regarding the structural integrity of the building. A structural engineer from USEPA START contractor Tetra Tech inspected the building and agrees with the Fehr-Graham conclusions. Furthermore, additional damage was discovered on the exterior side of the west wall of the building during the site visit increasing concern that partial of complete structural failure of the building is imminent unless stabilization or controlled demolition measures are taken immediately.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

08/21/2015 - Remove last section of wall in NE corner; minor damage to adjacent building; moved remaining debris in basement to loading area; 20 loads of ACM debris shipped; one load of scrap steel recycled.
08/24/2015- Continue loading ACM debris; 19 loads shipped; negotiated repair work with owner of adjacent building, owner will get estimate for work; Bank requesting rent for use of parking lot during removal action, EPA will agree to rent request and re-seal and re-stripe parking lot; removing protective material from adjacent roof.
08/25/2015 - Completed debris removal, shipped 20 loads of ACM debris; completed cleaning and washing adjacent roof; sweep and wash area around foundation.
08/26/2015 - Backfilling foundation with limestone screenings; general site cleanup.
08/27/2015 - Continue backfilling foundation; decon trailer demobed.
08/28/2015 - Continue backfilling foundation; prep equipment for demobe.
08/31/2015 - Backfilling and compaction completed; waiting on repair bid from adjacent building owner; prep equipment for demobe.
09/01/2015 - Crane and compactor demobed; RA Report sent in for completion; continue general cleanup.
09/02-04/2015 - RM and clerk on-site demobing remaining equipment.
09/08-10/2015 - RM on site to demobe site trailers and oversee sealcoating and stripping of parking lot; site fencing removed; ERRS working on payments to Bank for rent and adjacent owner for repair work.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Current property owner was sent a General Notice Letter, financial resources were not available to conduct the removal work.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
ACM Debris	solid	1530 tons			Laraway landfill, Joliet, Il
Scrap Metal	solid	140 tons			Recyling thru subcontractor

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
		NA

	Cubic yards of contaminated sediments removed and/or capped	
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
	Number of contaminated residential yards cleaned up	NA
Stand Alone Assessment	Number of workers on site	9
Contaminant(s) of Concern	Asbestos	
Oil Response Tracking		
Estimated volume	Initial amount released	NA
	Final amount collected	NA
	FPN Ceiling Amount	NA
CANAPS Info	FPN Number	NA
	Body of Water affected	NA

Administrative and Logistical Factors (Place X where applicable)

X	Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	X	Community challenges or high involvement		Radiological
	More than one PRP		Endangered Species Act / Essential Fish Habitat issues		Explosives
	AOC		Historic preservation issues		Residential impacts
	UAO		NPL site		Relocation
	DOJ involved		Remote location		Drinking water impacted
	Criminal Investigation Division involved		Extreme weather or abnormal field season		Environmental justice
	Tribal consultation or coordination or other issues		Congressional involvement	X	High media interest
	Statutory Exemption for $2 Million		Statutory Exemption for 1 Year		Active fire present
X	Hazmat Entry Conducted – Level A, B or C		Incident or Unified Command established		Actual air release (not threatened)

Green Metrics

	Metric		**Amount**		**Units**
	Diesel Fuel Used		300		gallons
	Unleaded Fuel Used		250		gallons
	Alternative/E-85 Fuel Used				gallons
	Electricity from electric company		NA		kWh
	Electric Company Name and Account #		NA		
	Electricity from sources other than the electric company		Generator		350 kWh
	Solid waste reused		Spent limestone screenings		2000 tons

	Solid waste recycled	Scrap Steel	140 tons
	Water Used	60,000	gallons

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2.2 Planning Section

2.2.1 Anticipated Activities

Submit payments to Bank and adjacent building owner.

2.2.1.1 Planned Response Activities

No additional response actions anticipated

2.2.1.2 Next Steps

None

2.2.2 Issues

Communication service was disrupted to an adjacent business due to line damage from demolition work. ATT was requested to move the line prior to work start, but action was not completed. New line is being located to the front of the building to restore service. Minor damage to the adjacent building wall and roof, will negotiate repair work with owner.

2.3 Logistics Section

ERRS and Demolition company supplied all personnel and equipment.

2.4 Finance Section

2.4.1 Narrative

All costs are processed through ERRS.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$800,000.00	$615,841.00	$184,159.00	23.02%
TAT/START	$25,000.00	$19,534.00	$5,466.00	21.86%
Intramural Costs				
Total Site Costs	$825,000.00	$635,375.00	$189,625.00	22.98%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this

report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Demolition contractor had a certified asbestos manager on site, EPA was overall safety officer.

2.5.2 Liaison Officer

NA

2.5.3 Information Officer

Charles Rodriguez, EPA, is the Community Involvement Coordinator.
Site Fact Sheet was distributed to the adjacent businesses in the area. Fact sheet was posted on signs along the east and north perimeter fencing.

3. Participating Entities

3.1 Unified Command

EPA

3.2 Cooperating Agencies

City of Ottawa
Illinois EPA

4. Personnel On Site

EPA - 1
START - 1
ERRS - 2
American Demolition - 6
RiskNomics - 1

5. Definition of Terms

EPA - Environmental Protection Agency
ERRS - Emergency & Rapid Response Services
HASP - Health and Safety Plan
mg/kg - milligrams per kilogram
OSC - On scene coordinator
ppb - parts per billion
ppm - parts per million
RM - removal manager
START - Superfund Technical Assessment & Response Team
TDD - Technical Direction Document
TO - Task Order
ACM - Asbestos Contaminated Material
f/cc - fibers per cubic centimeter
PEL - Permissible Exposure Level

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/littlecitybuilding

6.2 Reporting Schedule

No additional reports anticipated

7. Situational Reference Materials

No information available at this time.